

Federal Aid Coordinators Working Group Real Property Monitoring and Reporting Best Practices

INTRODUCTION, HISTORY, AUTHORITIES

Summary

In April of 2023, the U.S. Fish and Wildlife Service's (Service) Wildlife and Sport Fish Restoration (WSFR) Program announced the commencement of a real property status reporting period beginning May 1, 2023 and concluding on April 30, 2026. In response, the Federal Assistance Coordinators Working Group (FACWG), with technical input from WSFR staff, began working to identify and develop the following best practices to provide resources and assistance to States and Territories in order to expedite their ability to meet this first ever real property status reporting period. These best practices include recommendations for both ongoing property monitoring and management efforts, as well as specific best practices for reporting the status of lands.

Prior to establishing the ongoing real property status reporting period, WSFR had not required States to submit real property status reports. It is fully anticipated that this first reporting effort will be a learning experience for States and the Service alike. These best practices should be considered a living document and will be updated as necessary to reflect current best practices and latest lessons learned. The intention is that the best practices identified here will be useful for both current and future real property status reporting efforts as well as for any interim efforts by States to monitor and document the status of lands purchased with WSFR-administered Federal financial assistance.

General Financial Assistance Requirements for Real Property (Lands)

WSFR-administered programs are some of the most successful conservation programs in history. For over 85 years, WSFR funding has been used by States, Territories, and the District of Columbia (hereafter referred to as "States") to acquire real property (i.e., land) for a variety of eligible purposes, including public access for hunting, sport fishing, and other wildlife-oriented recreation; protection and enhancement of fish, wildlife, and their habitats; and construction of public target ranges, boating access facilities, and recreational sport fishing facilities.

Title to real property acquired or improved under a Federal award vests upon acquisition in the non-Federal entity (e.g., States and land trusts). Federal law and regulation require that real property must be used for the originally authorized purpose as long as needed for the purpose, during which time the non-Federal entity must not dispose of or encumber its title or other interests (2 CFR 200.311(b) / 43 CFR 12.71(b)). When real property is no longer needed for the originally authorized purpose, the non-Federal entity must obtain disposition instructions from the Federal awarding agency or pass-through entity, unless otherwise provided by Federal statutes or regulations (2 CFR 200.311(c) / 43 CFR 12.71(c)).

Non-Federal entities are required to maintain real property records pertinent to the Federal award for 3 years after final disposition (2 CFR 200.334(c) / 43 CFR 12.82(c)(2)). Non-Federal entities are also required to maintain internal controls to provide reasonable assurance that they are managing the Federal award in compliance with Federal statutes, regulations, and terms

and conditions (2 CFR 200.303) and control of all assets acquired under the Federal award to ensure that they serve the purpose for which acquired throughout their useful life (50 CFR 80.90(f)). Internal controls and records management help to ensure that the interests in real property are managed for and continue to serve the authorized purpose(s) under each Federal award.

Regulatory Requirements for Real Property Status Reporting

In addition to performance and financial reporting associated with individual awards, non-Federal entities are also required to submit reports at least every five years on the status of real property in which the Federal Government retains a long term (> 15 years) or permanent interest (2 CFR 200.330). For real property acquisition awards issued prior to October 29, 2019, recipients must work with WSFR to establish status reporting due dates going forward (2 CFR 1402.329(d)(6)).

2 CFR 1402.329(d)(4) requires that recipients must use the SF-429A to report status of land or interests in land under Department of the Interior (DOI) awards unless the bureau has obtained approval to use an alternative equivalent format. On February 9, 2021, WSFR received approval from DOI to use the Tracking and Reporting Actions for the Conservation of Species (TRACS) system as the alternative equivalent format to the SF-429A.

Historical Context for Status Reporting

Despite existing regulatory requirements for real property status reporting, WSFR has not previously required award recipients to submit the SF-429A. Time and efforts were instead focused on completing lands record reconciliations between States and WSFR Regional Offices, developing the TRACS Real Property Status Reporting Module, and integrating lands records into TRACS.

However, the DOI - Office of Inspector General (OIG) annually performs audits of the Wildlife Restoration and Sport Fish Restoration mandatory programs. In response to repeat findings, OIG issued a Service Management Advisory (Report No. 2019-CR-015) identifying, among other concerns, that WSFR and the States had not complied with the real property status reporting requirements under 2 CFR 200.330.

As part of the corrective action to this management advisory, and to ensure compliance with numerous existing regulatory requirements, WSFR worked with its State partners to identify an approach for an initial real property status reporting effort. As a result of this collaboration, the Assistant Director of the Wildlife and Sport Fish Restoration Program announced the commencement of a real property status reporting period beginning May 1, 2023, through April 30, 2026.

Initial 3-Year Reporting Period

During this initial 3-year period, States will work closely with their respective Regional Offices to certify, in TRACS, that lands purchased in whole or in part under Federal awards, or used as match towards a Federal award, is: (1) still being used for the purpose(s) for which it was acquired; and (2) still in compliance with the award terms and conditions and current regulations.

This 3-year reporting period will include only lands that both a) were purchased under programs currently integrated into TRACS, and b) have a “final approved” status in TRACS dated prior to April 1, 2023. For the majority of States, the WSFR-administered programs that are being entered into TRACS include:

- Wildlife Restoration Programs and Subprograms
- Sport Fish Restoration Program and Subprograms
- State Wildlife Grants
- Coastal Wetlands Act Grant Program

However, States should review their land records information in TRACS as they may include land acquisitions from other Service or WSFR-administered financial assistance programs. Lands that have been acquired solely with State hunting and fishing license revenue or other non-Federal financial assistance programs are not subject to the real property reporting requirements of 2 CFR 200. Other Federal financial assistance programs not administered by WSFR may also develop their own requirements and timelines related to real property status reporting.

The initial 3-year period is intended to accommodate different levels of preparedness amongst Regions and States to accomplish real property status reporting. The extended duration of the reporting period also provides for a learning curve related both to status reporting itself as well as the use of TRACS as a reporting tool. Moving forward, a framework for future reporting periods will be developed that ensures that States and WSFR are meeting regulatory requirements for real property status reporting.

Purpose of BMPs

These BMPs were developed by the FACWG, with technical input from WSFR staff, to serve as nonbinding guidance for States as they begin to consider more robust management, monitoring, and status reporting efforts related to lands. Each State will make their own determinations regarding how best to balance staff resources, funding, and tools to support real property status reporting and associated activities. Although this document was developed to provide guidance to States for the initial three-year status reporting period, the BMPs identified herein will likely be applicable beyond the 2026 deadline and may inform ongoing refinement of monitoring and management policies and procedures.

Authors

This document was created by a subject matter expert team assembled by the FACWG with technical input from WSFR staff. Specific participants included members from Alabama, Alaska, Arkansas, Arizona, Delaware, Guam, Ohio, Oklahoma, Minnesota, Montana, Rhode Island, and Wisconsin.

Definitions

Encumbrance means a legally binding limitation on real property, which may lessen its value or burden, obstruct, or impair its use, but not necessarily prevent transfer of title (e.g., liens, leases, easements, assignments of rights, etc.).

FACWG means the Federal Assistance Coordinators Working Group.

Federal Interest means the interest or rights that the Federal government holds in real property resulting from the use of Federal funds to acquire or manage real property. Also referred to as the Federal nexus. Federal interest in real property brings with it additional requirements for the use, management, and disposition of that property.

Purpose means the reason(s) for which real property is acquired or is being managed for under a Federal award; purpose may be found in an explicit purpose statement or may need to be inferred from project documentation. Commonly referred to as “intended” or “authorized” use or purpose.

Real Property means one, several, or all interests, benefits, and rights inherent in the ownership of a parcel of land or water. Examples of real property include fee, conservation easements, access easements, utility easements, and mineral rights. A leasehold interest is also real property except in those States where the State Attorney General provides an official opinion that determines a lease is personal property under State law.

Reconciliation means the act of comparing Service and recipient land records in order to: a) identify any discrepancies between land records, and b) resolve any discrepancies to provide consistency between federal and non-federal land records.

Secondary Use means any use of real property that does not relate to the purposes for which it was acquired or is being managed under a Federal award.

Status Reporting means the process where a State attests that real property purchased in whole or in part with Federal financial assistance, or used as match as part of a Federal award, is: 1) still being used for the purpose(s) for which it was acquired; and 2) still in compliance with the award terms and conditions and current regulations (2 CFR 200.330; 2 CFR 1402.329(d)). Also referred to as certification.

TRACS means Tracking and Reporting Actions for the Conservation of Species, the tracking and reporting system used to capture conservation and related actions funded by WSFR-administered grant programs.

WSFR means the U.S. Fish and Wildlife Service’s Wildlife and Sport Fish Restoration Program.

PART 1: MONITORING AND DOCUMENTING THE STATUS OF REAL PROPERTY (LANDS)

This section provides suggested best management practices (BMPs) for ongoing efforts by States to monitor and document the status of real property (i.e., lands). These BMPs may or may not relate directly to a status reporting period, but all reflect and support efforts by States to effectively manage land and ensure that proper documentation exists in order to effectively and efficiently report the status of land when required by the Service.

BMP 1: States should have a strong policy and procedures system for land management, decision making, monitoring, and reporting; establish in writing how the State ensures that property is used for its authorized purposes and remains in compliance.

Written policies and procedures that document land management, monitoring, and information collection activities and approaches are critical to ensuring that lands purchased or managed

with Federal financial assistance: a) continues to be used for the purposes for which it was acquired or is being managed, and b) remains in compliance with award terms and conditions and Federal regulation. Policies and procedures for lands may be implemented at various or multiple scales (e.g., agency-wide vs property-specific or both). Key characteristics of policies and procedures related to lands may include the following:

- 1.1 Identification of the entity who is charged with monitoring and reporting responsibilities for lands purchased with Federal financial assistance within the agency. Similarly, identification of the entity responsible for management and decision-making authority related to the lands.
- 1.2 Information on how land managers are trained to understand the purpose for which the property was acquired as well as other context necessary for informed decision making about compliant property management and use. Policies and procedures should include information on compliance requirements for day-to-day operations and decisions, plus checks and balances to ensure land is used only for its authorized purposes and remains compliant with all applicable laws and regulations.
- 1.3 Specific rules, controls, or guidance for activities that have frequent and/or significant compliance implications (e.g., encumbrances, disposals, secondary commercial and recreational uses, etc.), including who is responsible for making decisions related to these issues. Include identification of any potential weak spots.
- 1.4 Mechanisms that directly address continuity of knowledge related to lands and preserve critical context related to the original land acquisition as well as ongoing land management activities.
- 1.5 Appropriate tools and data systems for land monitoring, management, and documentation.
- 1.6 Information on how and when monitoring activities and land management decisions are documented.
- 1.7 Any requirements needed to address hunting and fishing license revenue-acquired assets as well as requirements from other grants and grant programs. Policies and procedures for lands purchased or managed with Federal financial assistance may be incorporated into broader documentation for all lands acquired and managed by the State.

BMP 2: States should document monitoring activities being conducted by land managers or other staff who have appropriate expertise.

States often have numerous staff with different roles and responsibilities visiting property. These staff often directly or indirectly conduct monitoring activities or collect information that could be used to assess the status of lands. As a best practice, States should leverage and document these ongoing monitoring activities. Note that these staff could be land management staff routinely on the property or could be non-lands management staff (e.g., research/science staff, hunter education staff, conservation officers, etc.) who happen to be utilizing or visiting the property for some other purpose. Considerations for implementing this best management practice include:

- 2.1 Identification of who is the person(s) ultimately making the determination of intended use or compliance, and what information that individual might need to assess the status of real property. Consider how information is shared between

- the party making the determination and staff or non-staff collecting monitoring and assessment information.
- 2.2 Clarification as to what staff are being asked to specifically monitor for. For instance, are staff being asked to monitor only for physical encroachment? Are they being asked to assess if the property is being used for its intended purpose or otherwise make a determination about whether or not the property remains compliant with financial assistance terms and conditions or regulation? If the answers to these questions are yes, consider how these staff have access to the necessary property and grant context.
 - 2.3 Data collection forms and methods to standardize documentation and delivery of monitoring activities or information collected. An example land monitoring report is provided in Appendix C.

BMP 3: States should support land management, monitoring, and documentation activities with appropriate tools and technologies.

While it must be acknowledged that the tools and technologies available to States will vary considerably, States would ideally support land monitoring and documentation activities with robust tools and technology that improve both the efficiency and effectiveness of land monitoring efforts.

- 3.1 Ideally, States will incorporate robust spatial information with lands and grants data; staff conducting monitoring activities, as well as staff responsible for decision making related to lands, could have access to georeferenced parcel data that included critical lands and grant information, including the purpose for which lands were acquired.
- 3.2 Staff conducting monitoring and information collection activities should have access to tools or applications that allow for the real-time collection and documentation of georeferenced information about the property.

BMP 4: States should use consistent data practices to ensure the validity and viability of lands information.

Key to status reporting efforts and land issue resolution are accurate and reconciled land records. States will find it easier to report on the status of land if information about lands is recorded and reconciled on a regular basis.

- 4.1 As a shared system available to both States and WSFR Regional Offices, the TRACS Inventory Module should serve as a repository of lands data.
- 4.2 States are encouraged to make use of the TRACS Inventory Module's ability to create a record of land actions (encumbrances, disposals, etc.); relying on the TRACS Inventory Module to document lands information and land actions creates a dynamic process that results in real-time reconciliation of WSFR and State lands records.
- 4.3 States are encouraged to include certain pieces of information within TRACS and their own lands record systems that streamline data management and reporting efforts. Namely, States are encouraged to include the corresponding TRACS ID # in their State system or include some other unique identifier that makes it easier to crosswalk data between TRACS and any State system.
- 4.4 States are encouraged to include any additional information in TRACS, beyond the minimum required data fields for legacy records that will allow for the most

efficient use of the TRACS Real Property Status Reporting Module to complete status reporting activities. Including fields like Wildlife Management Area could allow States to group parcels within the reporting module for streamlined reporting. At a minimum, States must ensure that there is sufficient information within the TRACS Inventory Module to accurately identify parcels—the minimum required fields may not be sufficient for all States for this purpose. Appendix B identifies both minimum fields as well as additional fields in TRACS that may be useful.

- 4.5 States should consider using the TRACS Inventory Module’s “corrective action” functionality as a documentation tool for lands-related compliance issues outside of official status reporting periods. The documentation of issues as they occur will allow for more accurate and streamlined status reporting (corrective actions associated with properties will automatically be pulled into the next status report). States will likely have established thresholds for communicating lands-related issues with WSFR Regional Offices. Consult with the WSFR Regional Office on what is appropriate to enter as a corrective action in TRACS. In addition, consider documenting issues in TRACS that have the following characteristics: a) longer term issues; b) issues that are difficult to resolve and/or require WSFR consultation to resolve appropriately; c) issues that have the potential to straddle status reporting deadlines (i.e., the property may be out of compliance at the time of the next real property status report). Consult training resources in Appendix A related to corrective actions for more information.

BMP 5: States should prioritize limited resources; utilize a risk-based approach to prioritize lands for more rigorous monitoring; and/or identify lands for alternative monitoring methods.

States have limited time and resources to conduct monitoring activities and should consider time, funding, and staff resources when implementing policies and procedures related to lands monitoring and management. A risk-based approach to prioritize parcels in need of more robust monitoring can help make the most of limited resources. However, States will be required to report on the status of *all* lands that meet the criteria established by the reporting period; while States may prioritize some property for more robust monitoring, there will be a need for documentation to support status reporting for all lands purchased with Federal financial assistance.

- 5.1 Examples of risk characteristics that may warrant particular focus or attention for monitoring activities include, but are not limited to:
 - a. Property history—has the property had issues with encroachment, loss of control, or other types of noncompliance in the past (e.g., has it been previously identified during an audit)
 - b. Surrounding land uses that increase risk of encroachment or noncompliance (e.g., development, ineligible recreation activities, transportation infrastructure, etc.)
 - c. Geographic isolation of the property/frequency of staff visits; property that receives less attention from staff may be more prone to compliance issues
 - d. Property contains or is in close proximity to exploitable mineral or hydrocarbon resources
 - e. The property has significant public usage
 - f. The property is a partial interest (e.g., an easement)

- g. The titleholder to the real property is not the primary award recipient/fish and wildlife agency
 - h. There are permits or licenses for activities that could have conflicting purposes (e.g., grazing, logging)
 - i. The property is an older acquisition; records are no longer adequate or easily accessible, or the property may not have a Federal notice of participation included on the deed.
 - j. The property is subject to State or Federal legislation that has the potential to create a loss of control or other compliance issue (e.g., legislation providing for the forced pooling/extraction of resources, legislation that creates restrictions on control or oversight, legislation that creates a diversion of hunting and fishing license revenue, etc.).
 - k. Title is not held directly by the State, and the titleholding entity may not maintain adequate internal controls to ensure compliance with financial assistance requirements for lands.
- 5.2 When resources for in-person monitoring are limited, potential alternative methods may include (but are not limited to) the following. These activities may be conducted by the State itself or contracted out to a third party. States may also rely on partners to collect information used to assess the status of lands.
- a. Using remote-sensed data
 - b. Using drones/aerial surveys
 - c. Informal citizen monitoring (e.g., drop boxes, citizen monitoring campaigns, tip lines, etc.)
 - d. Organized volunteer monitoring
 - e. Formal partner monitoring agreements (e.g., partner with land trusts, NGOs, friends groups, etc. to monitor/collect information about lands)
 - f. Leverage staff outside of regular land management staff to collect information about the status of lands (e.g., hunter education staff, conservation officers, research staff, etc.).
- 5.3 Land management and monitoring activities are grant-eligible expenses under certain WSFR-administered programs. Where possible and feasible, States should consider using grant funds to provide additional resources of monitoring and information collection activities.

BMP 6: States should identify, understand, and document the purpose(s) for which lands were acquired.

The purpose for which land was acquired (e.g., the “authorized purpose” or “intended use”) is a critical piece of baseline information for effective and compliant management of lands with a Federal financial assistance nexus.

- 6.1 Purpose is typically defined in the original grant documentation. Purpose may be explicit or may need to be inferred from the grant narrative or other contextual information. States are encouraged to confer with their WSFR Regional Offices regarding any purpose(s) that appear subjective or require inference from grant documentation.
- 6.2 WSFR Regional Offices may have additional records or information pertaining to an award that can be used to define or interpret purpose. If States have questions or concerns related to purpose, they should work closely with WSFR Regional Offices to clarify and document the purposes for which lands were acquired.

- 6.4 For Federal Aid in Wildlife Restoration and Federal Aid in Sport Fish Restoration acquisitions, if the property has an identifiable purpose, but the property is no longer capable of meeting that purpose, States should rely on the existing process outlined in regulation (50 CFR 80.137).
- 6.5 If *no* purpose can be readily identified, either by the State or the WSFR Regional Office, States should consult with the WSFR Regional Office on how to establish an eligible purpose for the property. With historical lands records, it may be possible that a purpose was not explicitly articulated or cannot be identified. It may be a regularly occurring need that States revisit purpose.
- 6.6 Purpose should be documented with other lands information (i.e., included in lands records).
- 6.7 States should consider prioritization of available resources (technical, staffing, or financial) when considering the extent to which it is necessary to review parcel-specific records to define the purpose for which a parcel of land was acquired.

BMP 7: States should understand potential red flags related to interference with purpose.

Purpose is the benchmark for land management activities. Potential red flags for interference with purpose include the following. States may consult with WSFR Regional Offices on determinations of interference with authorized purpose or intended use.

- 7.1 Current management objectives or activities do not align with the identified or inferred purpose from the Federal award.
- 7.2 Secondary activities are taking place that have potential to interfere with the purpose for which the property was acquired.
- 7.3 The purpose of the property cannot be readily identified.

BMP 8: States should understand potential red flags related to noncompliance with award terms and conditions and applicable regulation.

States are responsible for ensuring that the use and management of land remains consistent with the terms and conditions of the original acquisition award, as well as with current regulation and policy. Because the management of land is an ongoing activity, new regulation or policy may impact management (and therefore monitoring) requirements. Although it remains the responsibility of the State to ensure that lands are compliant, the following items may warrant particular focus; these items represent some of the most common and current regulations that impact the use and management of lands purchased with Federal financial assistance.

- 8.1 Special terms and conditions of a particular award, including (but not limited to) conditions on: public access requirements; revenue earned during and/or after the period of performance; any commercial or recreational secondary uses of the property (e.g., timber harvest).
- 8.2 Common regulations and policy affecting the use and management of lands and real property included the following. States should consult any program-specific regulations for details related to a particular grant program.
 - a. Regulations and Service policy relating to commercial and recreation secondary use (e.g., 50 CFR 80.134(d); 522 FW 21; 522 FW 22)
 - b. Regulations and policy related to the handling of revenue received during and after the period of performance, including program income (e.g., 2 CFR 200.307; 50 CFR 80 Subpart I; 50 CFR 80.20; 50 CFR 84.48(a)(5))

- c. Regulations and policy related to loss of control and diversion (e.g., 50 CFR 80.21; 50 CFR 80.22; 50 CFR 80.132; 50 CFR 80.48(a)(3); 522 FW 20)
- d. Regulations and policy relating to the encumbrance of real property (e.g., 2 CFR 200.311, 50 CFR 80.48(a)(4))
- e. Regulations and policy related to the disposition of real property (e.g., 2 CFR 200.311; 50 CFR 80.137; 50 CFR 84.48(a)(4); 522 FW 20)
- f. Regulations and policy relating to real property status reporting requirements (e.g., 2 CFR 200.330; 2 CFR 1402.329(d)).

PART 2: REPORTING ON THE STATUS OF REAL PROPERTY (LANDS)

This section provides BMPs specific to the use of the TRACS Real Property Status Reporting Module to report on the status of lands during the initial status reporting period (May 1, 2023 – April 30, 2026). This guidance is preliminary pending lessons learned over the next several years as States commence reporting efforts; this BMP document will be updated as needed to reflect the most current best practices.

This section is not intended to serve as a step-by-step guide for using the TRACS Real Property Status Reporting Module to complete status reporting for lands. The FACWG encourages States to make use of additional resources (Appendix A) as needed.

The TRACS Real Property Status Reporting Module serves as a DOI-approved alternative to the SF-429A form. There are effectively two steps necessary to complete this initial status reporting period using the TRACS system. Best practices for each of these steps are detailed below.

2.1 – STEP 1: ENSURE THAT LANDS INVENTORY RECORDS IN TRACS ARE ACCURATE AND SUFFICIENT TO COMPLETE THE STATUS REPORTING PROCESS.

BMP 9: States should request a copy of existing inventory records in TRACS by submitting a TRACS helpdesk ticket (tracs-helpdesk@fws.gov).

- 9.1 Inventory records in TRACS for “legacy” lands acquired prior to January 1, 2021, likely only include a minimum subset of data and data fields that were reconciled with WSFR Regional Offices. In order make use of the following best practices, States should request a copy of all inventory records currently in TRACS, including both legacy and “new” records (i.e., land inventory records for properties acquired after January 1, 2021).

BMP 10: States should review land inventory records and confirm that records are assigned to the appropriate TRACS Group.

Status reports will be generated within TRACS by TRACS Group—i.e., all property assigned to a single TRACS Group will be included on a single real property status report.

- 10.1 When legacy records were ingested into the TRACS Inventory Module, some records were not assigned or were not able to be assigned to the appropriate TRACS Group. TRACS Groups are permission groups which allow only an authorized subset of TRACS users to view and edit records assigned to a given TRACS Group. If land inventory records were not assigned to the appropriate

TRACS Group, they will not appear to the TRACS user. Confirming that land inventory records are assigned to the appropriate TRACS group—and conversely, confirming that a given TRACS group has all relevant lands assigned to it—is a critical first step. States should consult with their WSFR Regional Office for more information.

BMP 11: States should review land inventory records and confirm that records are accurate and complete.

- 11.1 States should review inventory records in TRACS to ensure that records are both accurate and complete. The reconciliation process that formed the basis for the ingestion of inventory records was completed several years ago. States should work to ensure that acquisitions and/or land actions (e.g., encumbrances or dispositions) have been accounted for.
- 11.2 States should also work to ensure that existing inventory records in TRACS are accurate and align with any State database or information system.

BMP 12: States should consider adding additional information into TRACS to supplement the minimum required data fields for legacy land records.

Not all States will have information on lands beyond the minimum data fields readily available. However, the FACWG recommends that States consider adding additional information to TRACS real property inventory records when feasible.

- 12.1 Some States have found that the minimum required data fields that form the basis for most legacy land records may not be sufficient to retroactively identify parcels quickly and easily. The FACWG recommends that States assess whether or not current inventory records, especially legacy land records, contain enough information for States to identify specific parcels.
- 12.2 States should also broadly consider adding additional information to supplement minimum data fields for legacy records. Including additional lands information for legacy records will “future proof” the data and ensure that TRACS continues to meet needs into the future. For example, States may want to consider adding information related to “purpose” for legacy land records, either making use of existing TRACS fields or by including a narrative comment.
- 12.3 Adding additional information at this point makes use of the limited window of opportunity described below to make substantial data edits—or even completely replace—legacy lands records.

BMP 13: States should confirm that records contain sufficient detail to make best use of the functionality in the TRACS Real Property Status Reporting Module.

The TRACS Real Property Status Reporting module contains functionality to create “named property groups” based on a number of different criteria. These named property groups exist only within the TRACS Real Property Status Reporting Module and enable the State to report on the status of multiple parcels or records at once.

- 13.1 The ability to group parcels for reporting *en masse* will significantly streamline the reporting process. The FACWG strongly recommends that States make use of the name property group functionality to make the status reporting process as efficient as possible.

- 13.2 Properties can be grouped based on any available TRACS field; States should consider adding additional information to legacy records in order to make best use of this grouping functionality. Tables containing minimum required data fields (Table 1) and potential additional TRACS fields for consideration (Table 2) can be found in Appendix B.
- 13.3 Consider grouping not only parcels that have geographic proximity (i.e., all parcels in a WMA), but also parcels that have similar purposes or management activities.

BMP 14: States should work with the WSFR Regional Office and WSFR HQ’s Program Accomplishment Reporting (PAR) Branch to make data changes in TRACS.

There is a limited window of opportunity to make substantial edits—or even completely replace—legacy land inventory records. In particular, the opportunity to replace legacy land records in TRACS is limited to the period preceding status reporting. Once status reports have been submitted, those reports are associated with the relevant inventory record, eventually creating a history of status reports associated with an inventory record. Inventory records may not be replaced once they have a status reporting history associated with them.

The FACWG recommends that States make use of this window of opportunity to address any of the data concerns identified above. Close collaboration with the WSFR Regional Office as well as with WSFR HQ PAR Branch will be necessary.

- 14.1 While working with PAR Branch on data updates or replacements, States should identify or create a unique identifier to associate with records; having a unique identifier present in both TRACS and any State system will allow for easier data amendments moving forward. States could make any field a unique identifier, potentially, but the TRACS identifier number may also be used.
- 14.2 After States have reviewed a copy of the available TRACS fields (Appendix A - TRACS Real Property Data Fields for Legacy Records Spreadsheet) and have received a copy of their inventory records currently in TRACS, they should review both to assess whether or not there are additional data needs. States should consult with their WSFR Regional Office and may submit a helpdesk ticket (tracs-helpdesk@fws.gov) to request a meeting with WSFR HQ PAR Branch to discuss next steps.

2.2 – STEP 2: USE THE TRACS REAL PROPERTY STATUS REPORTING MODULE TO REPORT ON THE STATUS OF LANDS

Once inventory records are confirmed to be accurate and sufficient for use in status reporting, States will use the TRACS Real Property Status Reporting module as a DOI-approved alternative to the SF-429A to report on the status of lands. There are two essential functions within the TRACS Real Property Status Reporting Module: the role of the data editor, individuals who can make comments and mark property as out of compliance; and the role of the non-Federal approver, the individual who is submitting the report to the Service.

BMP 15: States should identify and document which individuals within the organization are best suited to serve in a data editor role (marking properties as out of compliance and entering associated comments).

- 15.1 Multiple TRACS users may engage with the status reporting module. Consider dividing parcels between staff for better workflow (e.g., staff responsible for boating access programs should focus on access properties, wildlife staff should be responsible for WMAs, etc.).
- 15.2 States should document how the individuals assigned to the data editor role will have access to and make use of the information collected using the best practices in Part 1 of this document.
- 15.3 Consider creating a standardized comment that includes all necessary information in order to streamline the comment process and enforce consistency across comments.
- 15.4 Rely on TRACS Training materials for more information on entering real property status reports.

BMP 16: Identify and document which individuals within the organization are best suited to serve in a non-Federal approver role (submitting the real property status report to the Service).

- 16.1 Depending on the structure of a given State agency, the individual responsible for submitting the real property status report may vary. States should identify and document where the authority lies to submit the status report to the Service. This information should be included in the process and procedures documentation outlined in Part 1 of these BMPs.
- 16.2 States may wish to identify another individual who is not a TRACS user (e.g., a director or commissioner) as the responsible individual for status reporting. States should create a process and documentation chain for how internal approvals for status reporting submission might flow from the responsible individual to the individual with the TRACS non-Federal approver role who will actually submit the status report.
- 16.3 Alternatively, States may consider how the responsible entity (e.g., a director or commissioner) will delegate the authority/responsibility for status reporting to someone else in the agency (e.g., the individual with the non-Federal approval role in TRACS).
- 16.4 WSFR Regional Offices may have a preference for how States handle the status reporting approvals process and may require supplemental information from States outside of TRACS related to final approval of the status report. States should consult with their WSFR Regional Offices to ensure that there is agreement on this process.

APPENDIX A: ADDITIONAL RESOURCES

[TRACS \(fws.gov\)](https://www.fws.gov)

[U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Lands Course](#)

[U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program Training Portal](#)

- [Course 7: TRACS Real Property Inventory & Status Reporting \(fws.gov\)](#) (may need to login as guest)
 - [Course 7: Real Property Inventory and Status Reporting Manual](#)
 - [Lesson 7d: Enter a Real Property Status Report video](#)
 - [Lesson 7e: Real Property Corrective Action video](#)

[Suggested First Steps for Real Property Status Reporting](#)

[TRACS Real Property Data Fields for Legacy Records Spreadsheet](#)

APPENDIX B: TRACS DATA FIELDS FOR REAL PROPERTY

Table 1. Required "minimum data fields" imported into TRACS for legacy/historic lands acquired prior to January 1, 2021.

FIELDS SENT TO STATES	DESCRIPTION	FIELD MAPPED IN TRACS
STATE/TERRITORY	The group is listed as the State/Territory, or the more specific TRACS Group if available (such as Oregon Department of Fish and Wildlife)	TRACS GROUP (required)
TRACS/PROPERTY NAME	Enter the property name; the commonly known name designated by the State or WSFR office for any size of contiguous parcels/tracts assigned by the Grantee. It generally references the seller's name but could be assigned another name including a conservation/management area e.g., name of overall site (e.g. Deer Creek State Game Area, Oak Forest Nature Preserve).	TRACS PROPERTY NAME (required)
PROGRAM	Enter the CFDA number, grant program name, or grant program abbreviation for the original funding source (Wildlife Restoration or Sport Fish Restoration, occasionally may include other types like CIAP). The grant program does not display in the TRACS Real Property Record or on the PDF (it is only available behind the scenes in the database)	GRANT PROGRAM (not shown in TRACS)
GRANT_ID	Unique identifiers for the record, if available. Enter the State grant ID and/or federal grant number (either FAIMS or FBMS) associated with the original land acquisition. Could be same as SAP_PO_Number. The combination of grant ID/SAP PO Number and the grant program was mapped to create a unique LEGACY funding source behind-the-scenes in the database.	STATE GRANT ID and/or FEDERAL GRANT ID (optional)

FBMS_SAP_PO_NUMBER	The combination of grant ID/SAP PO Number and the grant program was mapped to create a unique LEGACY funding source behind-the-scenes in the database.	FUNDING SOURCE (not shown in TRACS)
INTEREST_TYPE	Fee Title or Partial (additional level of detail if partial may have been included if available)	INTEREST TYPE: fee or partial (required)
DOCUMENT ACRES	CURRENT acreage of land only (water records not required at this time) for the federal interest, as reflected on the deed, and taking into account any prior transactions which have occurred up to this point. Please note that this is NOT the GIS acreage, which would be auto-calculated by TRACS if a shapefile is provided	DEEDED ACRES (required)
WMA_NAME	Management Area Name (Wildlife or other type), if applicable. Some States also provided County and/or PLSS data. Some data that could not be mapped was entered into the general comments or location description fields, such as a WMA name that could not be located in the current TRACS list of WMAs.	WMA Association (optional)
ACQUISITION_DATE	Enter the date that your State and WSFR considers to be the official acquisition date for the parcel or property.	Date Acquired MM/DD/YYYY (required)
LAT (optional)	Must be positive decimal degrees - Latitude 39.827335. Added to the general location details. In some cases, the location info was used to create a mapped location (if lat/long provided, a specific mapped location created. If no lat/long, and a WMA or County provided, a mapped location linked to the center of the location, or if only the state provided, the center of the state was the mapped location).	Legacy lat (optional)

LONG (optional)	Must be negative decimal - Longitude-104.892463. Added to the general location details. In some cases, the location info was used to create a mapped location (if lat/long provided, a specific mapped location created. If no lat/long, and a WMA or County provided, a mapped location linked to the center of the location, or if only the state provided, the center of the state was the mapped location).	Legacy long (optional)
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Table 2. Suggested data fields that may be useful in addition to the minimum data fields in Table 1.

FIELD NAME	DESCRIPTION	NOTES
TRACS Unique Identifier		real_property_id; can form a unique identifier key
State Record ID	State land record unique identifier.	Can also potentially form a unique identifier key
Grant Name/Number		May include as a general comment or as part of the property name format.
Interest Type	Fee Interest; Partial Interest (Air Rights, Conservation Easement; Easement (Access/ROW); Life Estate; Mineral Rights; Surface Rights; Timber Rights; Water Rights (groundwater, stream, storage, riparian)	Can potentially include interest information beyond the fee/partial distinction required in the minimum data fields
County		Can be included narratively; no current field in TRACS
Project Name		Can be included narratively as a comment.
Purchase Cost		
Federal \$	Federal contribution to real property interest.	

State Contribution	State Agency contribution to acquire real property interest.	
Non-State Contribution	Third party contribution to real property interest. This could be cash or in-kind.	
Acquisition Purpose	Purpose or objectives and expected outcomes of the real property acquisition as it relates to the appropriate Act. Select from the following options: Access and Opportunities to Fish and Wildlife Dependent Recreation; Existing or Construction of Facilities; Species Management. Multiple fields are allowed.	TRACS offers these four options for the highest level of purpose; States may choose to drill down further for legacy records if useful or may choose to include purpose for legacy records as a comment in a separate field (general comments).
Date Deed Recorded	The date the deed is recorded at the County Recorder's office. This date is often stamped on the deed.	May differ from acquisition date.
Recording Book	The County Recorder book number where the applicable legal instrument (deed, easement, etc.) for the property is recorded.	
Recording Page(s)	The County Recorder page number where the applicable legal instrument (deed, easement, etc.) for the property is recorded.	
Instrument Number	A number assigned by the county at the time of the recording to a legal real property record e.g., deed, easement, etc.	
Grantor	Grantor is the person or institution that makes a grant or conveyance (e.g., the name on the Deed or legal instrument this may be the landowners name).	Seller
Titled to	The entity in which ownership interest in real property is being conveyed.	Likely the State F&W Agency; may be a third party for certain programs

APPENDIX C: SAMPLE LAND MONITORING REPORT

Date of Inspection:

Management Area:

Inspected By:

Tract:

Title:

PROPERTY BACKGROUND

Property/Acquisition Name:

Parcel ID #:

Town:

County:

Acquisition date:

Acres:

FEDERAL AID

YES

NO

Grant Program:

Grant Name:

Grant Number:

TRACS Federal ID:

Subrecipient

YES

NO

If Yes, Name of Deed Holder:

Subrecipient Contact Phone Number and Email:

Purpose:

Does this property still serve its approved purpose? YES NO

MONITORING

Method (check all that apply)

- Monitoring visit and boundary assessment**
- Analysis of aerial imagery**
- Site visit (monitoring to certify use/purpose)**
- Drone surveillance**

Were photos taken to document the current state of the property?

YES NO

Tract details (if applicable):

Signage completed (if applicable): Flagging Boundary Signs

Area

RESOURCES

Forest types:

Shrubland:

Rivers & streams:

Water bodies:

Wetlands:

Fields:

USES

Evidence of permitted use:

Evidence of prohibited use/violation:

BOUNDARY CONDITIONS

ENCROACHMENT CONCERNS

RECENT LAND MANAGEMENT PROJECTS

NOTES:

Signature of Land Monitor

Date